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The EU climate agenda cannot destroy our natural ecosystems

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Sirpa Pietikäinen, a member of the European Parliament from the EPP group and former Finnish Minister for the Environment, stresses that the complex equation of energy transition and strategic autonomy for the continent in terms of critical materials must not be solved at the expense of biodiversity, through the accelerated opening of new mines in Europe. Bad projects for ecosystems are also bad projects for local populations and for society. Her blog post is therefore a strong plea for Europe to position itself as a pioneer of innovation in the circular economy, while not cutting back on its demand for the sustainability of extractive projects, which are also part of a European model to be defended. More broadly, it calls on the next European Commission to assess its legislative proposals not only for their impact on climate, but also on biodiversity and toxic pollution: this is the guarantee that new economic projects will be truly viable for Europe.

In the summer of 2021, the European Commission released the Fit for 55 legislative package, aimed at ensuring the achievement of the EU's climate goals and climate neutrality target by 2050. The processing of the legislative package's proposals is now approaching its end as agreements have been reached one by one between the European Parliament and the European Council.

While the climate ambition and the ways to achieve it have been agreed, the European Commission identified a new problem: how to secure the necessary raw materials for the energy transition and the drive towards carbon-neutral industries. Green energy solutions, digitalisation, and, for example, electric vehicles require a massive amount of

critical raw materials-those with high demand and limited availability.

At the same time, the geopolitical situation in Europe dramatically changed due to Russia's invasion of Ukraine. Europe can no longer rely on critical raw materials imported from Russia. There is also a reluctance to give more power to China, which increasingly dominates global trade and natural resources, in the realisation of Europe's energy transition. China's growing influence and massive investments, especially in Africa, have raised concerns in Europe. Dependence on the availability of raw materials increases uncertainties and investment risks. Strategic self-sufficiency is now the new buzzword used to justify all legislative proposals and political opinions.

The critical proposal of critical raw materials

To achieve strategic self-sufficiency and a carbon-neutral industry, the European Commission proposed, in March 2023, a plan for critical raw materials as part of the Green Deal Industrial Plan. The underlying idea is desirable, as European self-sufficiency stabilises our markets against global fluctuations and ensures the availability of raw materials needed for technology and carbon neutrality goals.

However, in reality, we can not tackle the issue of a growing unsustainable demand for raw materials by opening new mines in Europe. In this way, we would not only extract raw materials in the Global South but also in Europe. To tackle the actual issue, we would need to secure a 10-fold increase in resource efficiency and closed-loop material cycles as well as design out waste and avoid the use of environmentally harmful and scarce materials.

Indeed, the proposal for critical raw materials is catastrophic, especially for the rural outskirts and pristine untouched nature areas of the EU, such as Northern Finland and Sweden. It essentially amounts to an emergency start for European mining. The proposal provides a fast track for new strategic mining projects, with permit processes not exceeding two years. The one-month notification period given to permit authorities for the consideration of applications is also too short to hear various stakeholders. The two-week deadline for submitting supplementary information is unrealistic, considering that supplements may involve additional environmental impact assessments.

Fast tracking the opening or extension of mines is neither environmentally nor economically sustainable. Expedited permit processes lead to careless environmental impact assessments, risking the occurrence of new incidents like the [Talvivaara case in Finland](#), which resulted in massive pollution of gypsum waste water leakage. Negligent environmental impact assessments threaten the environment, such as sensitive water systems, organisms, and biodiversity. The impacts also extend to local communities, facing serious risks in terms of public health and livelihoods.

There is a risk that EU peripheral areas, such as Northern Finland, would become the EU's short-lived resource bank, where hastily established mines would extract critical raw materials for the EU's growing material demand. The raw materials would flow to densely populated central powers, leaving Finland with a mess and a polluted environment. There is also a risk of restricting the rights, influence, and livelihoods of local communities and the Sámi people, the only recognised indigenous people in the EU, to expedite the launch of multinational mines.

Of particular concern in the proposal is that it would ease deviations from existing standards of protection for Natura-2000 areas and for water if the project is deemed strategically important and considered to be in "public interest". This is in direct contradiction with the EU's biodiversity strategy and the Nature Restoration Law. Giving up our protected areas to mines instead of increasing protected areas, which are desperately needed to halt biodiversity loss, is beyond problematic.

The foundation of the proposal for critical raw materials is built on new mines. The proposal suggests that only 15% of the EU's critical raw materials should be recycled by 2030. Although the Parliament slightly increased this, in my opinion, the target should be 75%. The basis of the proposal should be the circular economy hierarchy, aiming for a fully circular economy of critical raw materials that supports future-proofing our economies, considering not only climate goals but also other environmental factors such as biodiversity, non-toxicity, and general sustainability.

The goal of the proposal should be the development of alternative, more sustainable raw materials and innovations, achieving closed-loop material cycles, maximising resource efficiency and product life cycles, and leveraging the opportunities of urban mining, such as responsibly and sustainably opening landfills. For this, we would need a clear regulation to guide and ensure the responsible utilisation of landfills for material extraction and recycling. An example of alternative materials is solid-state batteries, which are likely to revolutionise the battery industry, rendering lithium-based batteries outdated. Outstanding progress in the development of these more sustainable and efficient batteries has already been made. In this case, investments in lithium mining projects would also backfire on investors, making the mines not only environmentally destructive but also economically unjustified.

Opening new mines should be the very last resort if all the aforementioned methods prove insufficient due to technical reasons. If new mines need to be opened, a comparison of interest should first be conducted with other industries. New mining projects should be done with consideration for all aspects of sustainability, without resorting to fast permitting, and taking into account the opinions of local communities in line with the principles of the [Aarhus Convention on public participation](#). New mines should be planned as underground mines rather than open-pit mines, using the best available technology to minimise negative impacts on the environment, local communities, and public health.

The mines would have to follow strict rules of emission permits on land, soil and water. Mining companies should also be subject to the extended producer responsibility making them liable, for example, for the payment of urban waste water treatment.

New mining projects should also establish plans for the clean-up and restoration of decommissioned mines and the surrounding environment. The proposal should rely on the precautionary principle, as the environmental and community impacts of mining projects will be significant for decades, often continuing even after the mine's closure. Indeed, new mines cause an irreversible change to the environment.

The European Parliament voted in favour of the regulation on critical raw materials in September 2023. I voted against the regulation. In Finland, mines like the Kevitsa mine already violate the existing [Extractive Waste Directive](#) as a number of mines in Finland are leaking or have leaked. If the current mines are leaking, mines established through a fast permitting process will also leak, regardless of whether environmental protection is mentioned in the requirements or not. Talvivaara, for example, was not supposed to leak according to the law, but it did anyway. Instead of loosening current mining legislation, we should tighten it. We urgently need to open the national mining laws, such as the loose one in Finland, to avoid the worst environmental disasters and to ensure the role of our local communities in the decision-making process.

Achieving carbon neutrality is, of course, a necessity while combating climate change, and I welcome the European Commission's efforts to ensure the green transition of European industry. However, in our pursuit of carbon neutrality, we must not forget other environmental goals, such as biodiversity targets, as nature loss and climate change go hand in hand, feeding each other. To ensure the availability of critical raw materials, we must act a bit more critically to avoid the growing environmental problems that the emergency start of mining will inevitably cause.

Are we forgetting something?

The [Critical Raw Materials Act](#) is not the only legislative proposal focusing solely on energy transition and climate neutrality. Several promised proposals have been postponed due to efforts concentrated in climate action. A notable example is the [revision of the REACH Regulation](#), the overarching chemical legislation and the cornerstone of the toxic-free environment goal that has not seen the light of day despite a long wait. The legislation on harmful, toxic and hazardous chemicals is indeed heavily outdated, and thus the revision should be presented without delay as it is also the basis of a number of other legislations.

The European Commission is not alone with this mentality, as a loud group of Members of the European Parliament have decided that the (insufficient) climate action should be enough for now, as it alone is said to be overburdening our businesses and food systems. Therefore, all actions on biodiversity and other environmental sustainability should wait for better times. Little are they discussing the sad reality that better times will not come if we do not act now in every aspect of environmental sustainability. And that costs of delays will be much higher than the costs of action according to a [recent statement by the ECB](#).

This is probably one of the most serious false estimates of climate politics. Unfortunately, it is not the only one. The other ones include the political focus on bioenergy and the compensation of emission reductions with bioenergy, moving from coal to natural gas due to failed taxonomy regulation, incomprehension of the importance of natural capital, and the inability to re-evaluate and revise the Common Agricultural Policy (CAP) with sustainability and regenerative agriculture in its core.

Instead of fixing the problems at once, we keep repeating the same mistakes over and over again. We should avoid taking sidetracks as they only waste our critical time and money on halfway solutions that do not even fix the problem. Frankly, when it comes to climate change and biodiversity loss, time is the scarcest resource we have. These sidetracks hindering our efforts are, for instance, biodiesel, plastics to fuel recycling, waste to energy, blue hydrogen, natural gas dependency, and justifying the extended use of fossil fuels with carbon capture and storage (CCS). We should also increase our investments, e.g. on the development of super grids and extensive railroad networks.

In addition to the supporters of sidetracks, there is also a group arguing that we should rely on climate manipulation with geoengineering technologies such as CCS or blocking the sunrays with tiny reflective particles suspended into the stratosphere or clouds. The problem is that these solutions do not actually solve the cause of the issue and therefore we would just keep fighting the never-ending war with climate change. In any case, they would not solve other environmental issues such as biodiversity loss, leading us all with an inhabitable planet anyways. In addition, climate manipulation would lead us to the era of "unknown unknowns". What happens if the particles in the air stop working and we have just kept burning more and more fossil fuels?

We have more than just one planetary boundary

To avoid the collapse of life, as we know it, the political focus should shift from sole climate action and the low-carbon deal to a deal fit for the planetary boundaries. The planetary boundaries represent critical Earth system processes that, if disrupted, could lead to abrupt and irreversible environmental changes. The boundaries include areas such as biodiversity loss, ocean acidification and novel entities in addition to the well-known climate change. Six out of the nine planetary boundaries have already [crossed the safe operating space](#), increasing the risk of major environmental changes.

To avoid the collapse of ecosystem services, such as clean water and air, healthy soils, and food that keep us alive and our companies and societies running, the European Commission should consider all planetary boundaries when proposing new legislation. A good example of a failed proposal leading to critical mistakes is the Critical Raw

Materials Act that I have used as an example on this paper.

One of the reasons behind many ill-designed legislative proposals is the Commission's Directorates-Generals (DGs) working independently of each other, only focusing on their core policy area. Instead of having different independent departments, we would need to create a single unit for planetary health. This should be a cross-disciplinary department including aspects of climate action (CLIMA), environment (ENVI), agriculture (AGR), ocean (MARE), and health and food safety (SANTE). To ensure that all planetary boundaries are respected, we would also need to create a scientific advisory board that peer-reviews the proposals to ensure that they are in line with the climate law and targets, but also with all other planetary boundaries as well. This way we would ensure that a proposal focusing for instance on climate action, would not be destructive to other parts of planetary boundaries and health.

One way to respect our planetary boundaries is to increase our efforts in implementing ambitious legislation under the new circular economy deal that focuses on tackling overconsumption while securing greater social justice in a world in which the prices of essential goods are likely to continue increasing due to booming global demand, which outpaces the planet's capacity.

The window of opportunity

The transition to a circular economy is not only about environmental sustainability, but there is also a real economic reason and benefit. We have a limited amount of natural resources and the sustainability challenge is enormous. The competition for scarce resources is intensifying every day, giving the one who is able to produce more efficiently with fewer raw materials or with more recycled content a competitive advantage.

The EU economy needs to be fully respecting our planetary boundaries by 2050. This is essential in order to reach the EU climate and biodiversity goals, and achieve strategic autonomy. A paradigm shift from a linear economy to a climate-neutral, resource-efficient, closed-loop circular economy is a way to get there. However, we do not have unlimited time and the change needs to accelerate. The window of opportunity is short-less than 30 years. During this time, we need to multiply our efforts and increase resource efficiency by tenfold. We need to produce the same welfare for people, better competitiveness for our industries and profits for our companies with a tenth of the resources we are currently using while ensuring that we have healthy ecosystems and a liveable planet for all.

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